



CRUMILLER P.C.

January 13, 2025

*VIA ECF*

Honorable Brian M. Cogan  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: *Kahlon v. County of Nassau, et al.*, Case No. 24-CV-02439

Dear Judge Cogan,

I write pursuant to the Court's directive during the January 2, 2024 pre-motion conference held in this matter. Upon further consideration, Defendant/Counterclaim Plaintiff Céline Boulben no longer intends to make the contemplated spoliation motion, nor seek summary judgment dismissing any claims against her.

It is our understanding that Defendant County of Nassau intends to proceed with its motion for summary judgment as discussed. The parties will also complete expert discovery as originally contemplated in a timely fashion.

Thank you for your time and attention to this matter.

Respectfully submitted,

Julia Elmaleh-Sachs

cc: Kevin T. Kearon  
Alexander Klein  
Ralph Reissman